Guide PDF

For foreign manufacturers, brands, importers and online sellers entering Italy. Find the relevant product stream, identify the possible EPR producer and prepare a documented review.

01 / RENAP - EPR

RENAP is the Italian national producer-register infrastructure under Legislative Decree 152/2006, Article 178-ter, and Ministerial Decree 144/2024. EPR liabilities arise under the rules for each product stream: RENAP is not one universal registration or a new tax.

02 / FOREIGN COMPANIES

A company established abroad that sells directly to Italian users, including online, may itself qualify as the EPR producer. WEEE rules expressly cover cross-border distance selling; an authorised representative may be relevant under the specific rules.

If an independent Italian importer places goods on the Italian market for the first time, that importer may be the responsible producer under the relevant scheme. A contractual clause alone cannot alter the statutory allocation.

Manufacturing outside Italy, without placing products on the Italian market, does not by itself trigger registration in an Italian sector register.

03 / PRODUCT STREAMS

Electrical and electronic equipment (WEEE/AEE): check Legislative Decree 49/2014 and the RENAP AEE Register. The obligated producer must register before operating; distance sales are included.

Batteries, including those integrated into products: Regulation (EU) 2023/1542 and Legislative Decree 29/2026 apply. The previous battery register remains active pending full implementation and the official opening notice for the new register.

Tyres: check the RENAP Tyre Register and Ministerial Decree 182/2019; distinguish replacement tyres from original equipment fitted to imported vehicles. Foreign operators may act through an authorised representative.

Packaging: assess Italian EPR/CONAI rules separately from Regulation (EU) 2025/40 (PPWR). Do not presume that a single RENAP packaging filing already applies to every operator.

Textiles and footwear: Directive (EU) 2025/1892 creates an EPR framework, but the opening of an Italian sector register must be checked; it must not be assumed from the Directive alone.

04 / EVIDENCE AND TIMING

Keep company identity and mandates, brand and supply contracts, SKU catalogue, invoices, customs records, destination markets, unit weights, registration certificates and annual reports.

Practical 30-day sequence: week 1 classify products and operators; week 2 check official registers and current guidance; week 3 reconcile quantities and evidence; week 4 complete required filings. This plan never extends legal deadlines or prior-registration requirements.

OFFICIAL SOURCES / RENAP - EUR-LEX

1. RENAP - institutional framework and registers
2. Ministerial Decree 15 April 2024, no. 144
3. RENAP - AEE Register and guidance
4. RENAP - Batteries Register
5. RENAP - Tyre Register
6. RENAP - 2026 Italian Battery Decree and transition
7. Regulation (EU) 2023/1542 - batteries
8. Regulation (EU) 2025/40 - packaging (PPWR)
9. Directive (EU) 2025/1892 - waste and textiles

> General information checked on 29 November 2026. This tool and these PDFs do not certify compliance, grant exemptions, perform registrations or replace advice based on documents and current official notices.

Studio Liguori & Fimiani · 29.11.2026 · https://studioliguorifimiani.com/en/renap-italy-foreign-producers/ · Request a confidential legal assessment of the company's EPR position